



# San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT



AUG 13 2014

Mr. Timothy Alburger  
Seneca Resources  
2131 Mars Court  
Bakersfield, CA 93308

**Re: Notice of Minor Title V Permit Modification  
District Facility # S-1114  
Project # S-1142944**

Dear Mr. Alburger:

Enclosed is the District's analysis of your application for minor Title V permit modification for the facility identified above. You proposed a Title V minor permit modification to incorporate recently issued Authorities to Construct (ATC) #S-1114-103-6 and '-103-7 into the Title V operating permit. ATC S-1114-103-6 lowered the NOx emissions limit from 25 ppmv @ 15% O2 to 11 ppmv @ 15% O2 for Rule 4702 compliance. ATC S-1114-103-7 designated the equipment as a compliant dormant emissions unit (DEU).

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued Authorities to Construct (ATC) #S-1114-103-6 and '-103-7, emission increases, application, and previous Title V permit. This project will be subject to a 45-day EPA commenting period prior to the District taking final action.

If you have any questions, please contact Mr. Leonard Scandura, Permit Services Manager, at (661) 392-5500.

Thank you for your cooperation in this matter.

Sincerely,

Arnaud Marjollet  
Director of Permit Services

Enclosures

cc: Gerardo C. Rios, EPA (w/enclosure) via email

Seyed Sadredin  
Executive Director/Air Pollution Control Officer

Northern Region  
4800 Enterprise Way  
Modesto, CA 95356-8718  
Tel: (209) 557-6400 FAX: (209) 557-6475

Central Region (Main Office)  
1990 E. Gettysburg Avenue  
Fresno, CA 93726-0244  
Tel: (559) 230-6000 FAX: (559) 230-6061  
[www.valleyair.org](http://www.valleyair.org)

Southern Region  
34946 Flyover Court  
Bakersfield, CA 93308-9725  
Tel: 661-392-5500 FAX: 661-392-5585  
[www.healthyliving.com](http://www.healthyliving.com)

## TITLE V APPLICATION REVIEW

Minor Modification

Project #: S-1114, 1142944

Engineer: Steve Davidson

Date: August 6, 2014

Facility Number: S-1114

Facility Name: Seneca Resources

Mailing Address: 2131 Mars Court  
Bakersfield, CA 93308

*Reviewed by ASMR AUE*

AUG 07 2014

Contact Name: Timothy R, Alburger

Phone: (661) 399-4270 ext 3544

Responsible Official: Brad Elliot

Title: Vice President – West Division

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### I. PROPOSAL

Seneca Resources is proposing a Title V minor permit modification to incorporate Authorities to Construct (ATC) #S-1114-103-6 and '-103-7 into their Title V permit. ATC S-1114-103-6 lowered the NOx emissions limit from 25 ppmv @ 15% O2 to 11 ppmv @ 15% O2 for Rule 4702 compliance. ATC S-1114-103-7 designated the equipment as a compliant dormant emissions unit (DEU).

Conditions will be placed on the permit to ensure the units make the requirements of this category.

### II. FACILITY LOCATION

The IC engine is located in Seneca's existing Western Heavy Oil Production Operations (NE ¼, Sec. 24, T26W, R20E).

### III. EQUIPMENT DESCRIPTION

S-1114-103-8: 325 HP NATURAL GAS-FIRED CATERPILLAR MODEL G3406 IC ENGINE WITH THREE WAY CATALYST, DRIVING A GAS COMPRESSOR

#### IV. SCOPE OF EPA AND PUBLIC REVIEW

This change to the Title V permit is considered to be a minor modification and, as such, requires no public review.

#### V. APPLICABLE REQUIREMENTS

District Rule 2520, Federally Mandated Operating Permits (Adopted June 21, 2001)

#### VI. DESCRIPTION OF PROPOSED MODIFICATIONS

ATC S-1114-103-6 lowered the NOx emissions limit from 25 ppmv @ 15% O2 to 11 ppmv @ 15% O2 for Rule 4702 compliance. ATC S-1114-103-7 designated the equipment as a compliant dormant emissions unit (DEU).

Condition # on PTO S-1114-103-5	Condition # on Propose PTO S-1114-103-8	Condition is New, Modified, or Removed	Reason for Change from Current PTO
--	1-5	New	Dormant emissions unit conditions placed on the permit,
3	8	Modified	NOx emissions lowered to 11 PPMV
21-29	26, 28-34	Modified	40 CFR Subpart ZZZZ conditions updated.

#### VII. COMPLIANCE

In accordance with Rule 2520, 3.20, these modifications:

1. Do not violate requirements of any applicable federally enforceable local or federal requirement;
2. Do not relax monitoring, reporting, or recordkeeping requirements in the permit and are not significant changes in existing monitoring permit terms or conditions;
3. Do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis;
4. Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include;
  - a. A federally enforceable emission cap assumed to avoid classification as a modification under any provisions of Title I of the Federal Clean Air Act; and

- b. An alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Federal Clean Air Act; and
5. Are not Title I modifications as defined in District Rule 2520 or modifications as defined in section 111 or 112 of the Federal Clean Air Act; and
6. Do not seek to consolidate overlapping applicable requirements.

Because these permit revisions meet all the above criteria, this is a Minor Modification.

In accordance with Rule 2520, the application meets the procedural requirements of section 11.4 by including;

1. A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
2. The source's suggested draft permit; and
3. Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used.

## **VIII. ATTACHMENTS**

- A. Proposed Modified Title V Operating Permit
- B. Authority to Construct
- C. Emissions Increases
- D. Application
- E. Previous Title V Operating Permit

# ATTACHMENT A

Proposed Modified Title V Operating Permit #  
S-1114-103-8

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-1114-103-8

**EXPIRATION DATE:** 02/29/2016

**SECTION:** NE24 **TOWNSHIP:** 26S **RANGE:** 20E

**EQUIPMENT DESCRIPTION:**

325 HP NATURAL GAS-FIRED CATERPILLAR MODEL G3406 IC ENGINE WITH THREE WAY CATALYST, DRIVING A GAS COMPRESSOR

## PERMIT UNIT REQUIREMENTS

1. Permittee shall submit written notification to the District upon designating the unit as dormant or active. [District Rule 2080] Federally Enforceable Through Title V Permit
2. While dormant, normal source testing shall not be required. [District Rule 2080] Federally Enforceable Through Title V Permit
3. Upon recommencing operation of this unit, normal source testing shall resume. [District Rule 2080] Federally Enforceable Through Title V Permit
4. Any source testing required by this permit shall be performed within 60 days of recommencing operation of this unit, regardless of whether the unit remains active or is again designated as dormant. [District Rule 2080] Federally Enforceable Through Title V Permit
5. Records of all dates and times that this unit is designated as dormant or active, and copies of all corresponding notices to the District, shall be maintained, retained for a period of at least five years, and made available for District inspection upon request. [District Rule 1070]
6. Permittee shall maintain with the permit accurate fugitive component count associated with operation of engine/compressor and resultant emissions calculated using EPA Publication 453/R-95-017, Table 2-4 factors. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The engine shall only burn natural gas with fuel gas sulfur content of 2.0 grains/100 Scf or less. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Air contaminant emissions shall not exceed any of the following: NO<sub>x</sub>: 11ppmv @ 15% O<sub>2</sub>; VOC: 30 ppmv @ 15% O<sub>2</sub>; CO: 400 ppmv @ 15% O<sub>2</sub>; and PM<sub>10</sub>: 10.0 lb/MMscf. [District Rules 2201 and 4702] Federally Enforceable Through Title V Permit
9. The permittee shall monitor and record the stack concentrations of NO<sub>x</sub> (as NO<sub>2</sub>), CO, and O<sub>2</sub> at least once every calendar quarter using a portable emission monitor that meets District specifications [in stack O<sub>2</sub> monitors may be allowed if approved by the APCO]. Monitoring shall be performed not less than once every month for 12 months if 2 consecutive deviations are observed during quarterly monitoring. Monitoring shall not be required if the engine is not in operation, i.e. the engine need not be started solely to perform monitoring. Monitoring shall be performed within 1 day of restarting the engine unless monitoring has been performed within the last month if on a monthly monitoring schedule, or within the last quarter if on a quarterly monitoring schedule. Records must be maintained of the dates of non-operation to validate extended monitoring frequencies. [District Rules 2201 and 4702] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE  
These terms and conditions are part of the Facility-wide Permit to Operate.

10. If the NO<sub>x</sub> and/or CO concentrations corrected to 15% O<sub>2</sub>, as measured by the portable analyzer, exceed the permitted emission concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 8 hours after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 8 hours, the permittee shall notify the District within the following 1 hour, conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing by this condition. [District Rules 2201 and 4702] Federally Enforceable Through Title V Permit
11. The permittee shall maintain records of: (1) the date and time of NO<sub>x</sub>, CO, and O<sub>2</sub> measurements, (2) the O<sub>2</sub> concentration in percent and the measured NO<sub>x</sub> and CO concentrations corrected to 15% O<sub>2</sub>, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 2201 and 4702] Federally Enforceable Through Title V Permit
12. District witnessed or approved compliance source testing for NO<sub>x</sub>, VOC, and CO emission limits shall be demonstrated not less than once every 24 months. [District Rules 2201 and 4702] Federally Enforceable Through Title V Permit
13. Compliance demonstration (source testing) shall be by District witnessed, or authorized, sample collection by ARB certified testing laboratory. [District Rule 1081] Federally Enforceable Through Title V Permit
14. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
15. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
16. The following test methods shall be used: NO<sub>x</sub> (ppmv) - EPA Method 7E or ARB Method 100, CO (ppmv) - EPA Method 10 or ARB Method 100, stack gas oxygen - EPA Method 3 or 3A or ARB Method 100, and VOC (ppmv) - EPA Method 25A or 25B, or ARB Method 100. [District Rules 1081, 4701, and 4702] Federally Enforceable Through Title V Permit
17. Fuel sulfur content and higher heating value shall be measured quarterly using gas chromatographic analysis to calculate SO<sub>x</sub> emission rate. Test reports of measured fuel sulfur content and higher heating value shall be maintained. The calculated SO<sub>x</sub> emission rate shall be recorded in format approved by the District. If compliance with the SO<sub>x</sub> emission rate has been demonstrated for 8 consecutive quarters for a fuel source, then the testing frequency shall be annually. If an annual fuel sulfur content and higher heating value testing fails to show compliance, quarterly testing shall resume. [District Rule 1070]
18. {2414} Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201, 3.1] Federally Enforceable Through Title V Permit
19. Sulfur compound emissions shall not exceed 0.2% by volume, 2000 ppmv, on a dry basis averaged over 15 consecutive minutes. [Kern County Rule 407] Federally Enforceable Through Title V Permit
20. The sulfur content of the natural gas being fired in the engine shall be determined using ASTM method D1072, D3031, D4084 or D3246. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
21. Permittee shall operate this engine with a nonresettable fuel meter and a nonresettable elapsed operating time meter. In lieu of operating a nonresettable fuel meter, the owner or operator may use an alternative device, method, or technique in determining monthly fuel consumption provided that the alternative is approved by the APCO. Permittee shall maintain these required meters in proper operating condition. The fuel meter shall be calibrated periodically per the recommendations of the manufacturer. [District Rules 2201, 4701, and 4702] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE  
These terms and conditions are part of the Facility-wide Permit to Operate.

22. Emissions source testing shall be conducted with the engine operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. [District Rules 4701 and 4702] Federally Enforceable Through Title V Permit
23. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit, the test cannot be used to demonstrate compliance with an applicable limit. VOC emissions shall be reported as methane. VOC, NO<sub>x</sub>, and CO concentrations shall be reported in ppmv, corrected to 15% oxygen. [District Rules 4701 and 4702] Federally Enforceable Through Title V Permit
24. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4701 and 4702] Federally Enforceable Through Title V Permit
25. The permittee shall maintain an engine operating log to demonstrate compliance. The engine operating log shall include, on a monthly basis, the following information: total hours of operation, type and quantity (cubic feet of gas or gallons of liquid) of fuel used, maintenance or modifications performed, monitoring data, compliance source test results, and any other information necessary to demonstrate compliance. [District Rule 4702] Federally Enforceable Through Title V Permit
26. This engine shall be operated and maintained in proper operating condition per the manufacturer's requirements as specified on the Inspection and Monitoring (I&M) plan submitted to the District. [District Rule 4702 and 40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
27. The permittee shall update the I&M plan for this engine prior to any planned change in operation. The permittee must notify the District no later than seven days after changing the I&M plan and must submit an updated I&M plan to the APCO for approval no later than 14 days after the change. The date and time of the change to the I&M plan shall be recorded in the engine's operating log. For modifications, the revised I&M plan shall be submitted to and approved by the APCO prior to issuance of the Permit to Operate. The permittee may request a change to the I&M plan at any time. [District Rule 4702] Federally Enforceable Through Title V Permit
28. The engine shall be in full compliance with the applicable sections of 40 CFR Part 63, Subpart ZZZZ (National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines). [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
29. The permittee must minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the emissions standards applicable to all times other than startup in Table 2d of 40 CFR 63 Subpart ZZZZ apply. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
30. The engine's oil and filter shall be changed every 1,440 hours of operation or every 12 months, whichever comes first. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
31. The engine's spark plugs shall be inspected every 1,440 hours of operation or every 12 months, whichever comes first, and replaced as necessary. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
32. The engine's hoses and belts shall be inspected every 1,440 hours of operation or every 12 months, whichever comes first, and replaced as necessary. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
33. The permittee shall maintain records of engine hours, dates, and cumulative hours since last service for each of the following maintenance activities: oil and filter changes, spark plug inspection and replacement, hose and belt inspection and replacement. [40 CFR 63 Subpart ZZZZ]
34. The permittee shall maintain records that include any information necessary to demonstrate compliance with 40 CFR 63, ZZZZ. [District Rule 1070 and 40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE  
These terms and conditions are part of the Facility-wide Permit to Operate.



35. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 4702 and 40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit

DRAFT

# ATTACHMENT B

Authorities to Construct #

S-1114-103-6

S-1114103-7



**San Joaquin Valley**  
AIR POLLUTION CONTROL DISTRICT



## AUTHORITY TO CONSTRUCT

**PERMIT NO:** S-1114-103-6

**ISSUANCE DATE:** 04/26/2013

**LEGAL OWNER OR OPERATOR:** SENECA RESOURCES  
**MAILING ADDRESS:** 2131 MARS COURT  
BAKERSFIELD, CA 93308-6830

**LOCATION:** HEAVY OIL WESTERN  
CA

**SECTION:** NE24 **TOWNSHIP:** 26S **RANGE:** 20E

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF 325 HP NATURAL GAS-FIRED CATERPILLAR MODEL G3406 IC ENGINE WITH THREE WAY CATALYST, DRIVING A GAS COMPRESSOR: REVISE PERMIT LIMITS TO COMPLY WITH RULE 4702, TABLE 2, CATEGORY 1.D

## CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Permittee shall maintain with the permit accurate fugitive component count associated with operation of engine/compressor and resultant emissions calculated using EPA Publication 453/R-95-017, Table 2-4 factors. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The engine shall only burn natural gas with fuel gas sulfur content of 2.0 grains/100 Scf or less. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Air contaminant emissions shall not exceed any of the following: NOx: 11 ppmv @ 15% O<sub>2</sub>; VOC: 30 ppmv @ 15% O<sub>2</sub>; CO: 400 ppmv @ 15% O<sub>2</sub>; and PM<sub>10</sub>: 10.0 lb/MMscf. [District Rules 2201 and 4702] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (661) 392-5500 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO

DAVID WARNER, Director of Permit Services

9/14-103-6 Apr 28 2013 10:22AM -- EDGEHILL : Joint Inspection NOT Required

6. The permittee shall monitor and record the stack concentrations of NO<sub>x</sub> (as NO<sub>2</sub>), CO, and O<sub>2</sub> at least once every calendar quarter using a portable emission monitor that meets District specifications [in stack O<sub>2</sub> monitors may be allowed if approved by the APCO]. Monitoring shall be performed not less than once every month for 12 months if 2 consecutive deviations are observed during quarterly monitoring. Monitoring shall not be required if the engine is not in operation, i.e. the engine need not be started solely to perform monitoring. Monitoring shall be performed within 1 day of restarting the engine unless monitoring has been performed within the last month if on a monthly monitoring schedule, or within the last quarter if on a quarterly monitoring schedule. Records must be maintained of the dates of non-operation to validate extended monitoring frequencies. [District Rules 2201 and 4702] Federally Enforceable Through Title V Permit
7. If the NO<sub>x</sub> and/or CO concentrations corrected to 15% O<sub>2</sub>, as measured by the portable analyzer, exceed the permitted emission concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 8 hours after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 8 hours, the permittee shall notify the District within the following 1 hour, conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing by this condition. [District Rules 2201 and 4702] Federally Enforceable Through Title V Permit
8. The permittee shall maintain records of: (1) the date and time of NO<sub>x</sub>, CO, and O<sub>2</sub> measurements, (2) the O<sub>2</sub> concentration in percent and the measured NO<sub>x</sub> and CO concentrations corrected to 15% O<sub>2</sub>, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 2201 and 4702] Federally Enforceable Through Title V Permit
9. District witnessed or approved compliance source testing for NO<sub>x</sub>, VOC, and CO emission limits shall be demonstrated within 60 days of issuance of this ATC and not less than once every 24 months thereafter. [District Rules 2201 and 4702] Federally Enforceable Through Title V Permit
10. Compliance demonstration (source testing) shall be by District witnessed, or authorized, sample collection by ARB certified testing laboratory. [District Rule 1081] Federally Enforceable Through Title V Permit
11. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
12. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
13. The following test methods shall be used: NO<sub>x</sub> (ppmv) - EPA Method 7E or ARB Method 100, CO (ppmv) - EPA Method 10 or ARB Method 100, stack gas oxygen - EPA Method 3 or 3A or ARB Method 100, and VOC (ppmv) - EPA Method 25A or 25B, or ARB Method 100. [District Rules 1081, 4701, and 4702] Federally Enforceable Through Title V Permit
14. Fuel sulfur content and higher heating value shall be measured quarterly using gas chromatographic analysis to calculate SO<sub>x</sub> emission rate. Test reports of measured fuel sulfur content and higher heating value shall be maintained. The calculated SO<sub>x</sub> emission rate shall be recorded in format approved by the District. If compliance with the SO<sub>x</sub> emission rate has been demonstrated for 8 consecutive quarters for a fuel source, then the testing frequency shall be annually. If an annual fuel sulfur content and higher heating value testing fails to show compliance, quarterly testing shall resume. [District Rule 1070] Federally Enforceable Through Title V Permit
15. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201, 3.1] Federally Enforceable Through Title V Permit
16. Sulfur compound emissions shall not exceed 0.2% by volume, 2000 ppmv, on a dry basis averaged over 15 consecutive minutes. [Kern County Rule 407] Federally Enforceable Through Title V Permit
17. The sulfur content of the natural gas being fired in the engine shall be determined using ASTM method D1072, D3031, D4084 or D3246. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

18. Permittee shall operate this engine with a nonresettable fuel meter and a nonresettable elapsed operating time meter. In lieu of operating a nonresettable fuel meter, the owner or operator may use an alternative device, method, or technique in determining monthly fuel consumption provided that the alternative is approved by the APCO. Permittee shall maintain these required meters in proper operating condition. The fuel meter shall be calibrated periodically per the recommendations of the manufacturer. [District Rules 2201, 4701, and 4702] Federally Enforceable Through Title V Permit
19. Emissions source testing shall be conducted with the engine operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. [District Rules 4701 and 4702] Federally Enforceable Through Title V Permit
20. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit, the test cannot be used to demonstrate compliance with an applicable limit. VOC emissions shall be reported as methane. VOC, NOx, and CO concentrations shall be reported in ppmv, corrected to 15% oxygen. [District Rules 4701 and 4702] Federally Enforceable Through Title V Permit
21. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4701 and 4702] Federally Enforceable Through Title V Permit
22. The permittee shall maintain an engine operating log to demonstrate compliance. The engine operating log shall include, on a monthly basis, the following information: total hours of operation, type and quantity (cubic feet of gas or gallons of liquid) of fuel used, maintenance or modifications performed, monitoring data, compliance source test results, and any other information necessary to demonstrate compliance. [District Rule 4702] Federally Enforceable Through Title V Permit
23. This engine shall be operated and maintained in proper operating condition per the manufacturer's requirements as specified on the Inspection and Monitoring (I&M) plan submitted to the District. [District Rule 4702 and 40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
24. The permittee shall update the I&M plan for this engine prior to any planned change in operation. The permittee must notify the District no later than seven days after changing the I&M plan and must submit an updated I&M plan to the APCO for approval no later than 14 days after the change. The date and time of the change to the I&M plan shall be recorded in the engine's operating log. For modifications, the revised I&M plan shall be submitted to and approved by the APCO prior to issuance of the Permit to Operate. The permittee may request a change to the I&M plan at any time. [District Rule 4702] Federally Enforceable Through Title V Permit
25. On and after October 19, 2013, the engine shall be in full compliance with the applicable sections of 40 CFR Part 63, Subpart ZZZZ (National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines). [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
26. On and after October 19, 2013, the permittee must minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the emissions standards applicable to all times other than startup in Table 2d of 40 CFR 63 Subpart ZZZZ apply. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
27. On and after October 19, 2013, the engine's oil and filter shall be changed every 1,440 hours of operation or every 12 months, whichever comes first. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
28. On and after October 19, 2013, the engine's spark plugs shall be inspected every 1,440 hours of operation or every 12 months, whichever comes first, and replaced as necessary. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
29. On and after October 19, 2013, the engine's hoses and belts shall be inspected every 1,440 hours of operation or every 12 months, whichever comes first, and replaced as necessary. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

30. On and after October 19, 2013, the permittee shall maintain records of engine hours, dates, and cumulative hours since last service for each of the following maintenance activities: oil and filter changes, spark plug inspection and replacement, hose and belt inspection and replacement. [40 CFR 63 Subpart ZZZZ]
31. On and after October 19, 2013, the permittee shall maintain records that include any information necessary to demonstrate compliance with 40 CFR 63, ZZZZ. [District Rule 1070 and 40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
32. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 4702 and 40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit



## AUTHORITY TO CONSTRUCT

**PERMIT NO:** S-1114-103-7

**ISSUANCE DATE:** 05/07/2014

**LEGAL OWNER OR OPERATOR:** SENECA RESOURCES  
**MAILING ADDRESS:** 2131 MARS COURT  
BAKERSFIELD, CA 93308-6830

**LOCATION:** HEAVY OIL WESTERN  
CA

**SECTION:** NE24 **TOWNSHIP:** 26S **RANGE:** 20E

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF 325 HP NATURAL GAS-FIRED CATERPILLAR MODEL G3406 IC ENGINE WITH THREE WAY CATALYST, DRIVING A GAS COMPRESSOR: DESIGNATE AS A COMPLIANT DORMANT EMISSIONS UNIT

## CONDITIONS

1. The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
2. While dormant, the fuel line shall be physically disconnected from the unit. [District Rule 2080] Federally Enforceable Through Title V Permit
3. Permittee shall submit written notification to the District upon designating the unit as dormant or active. [District Rule 2080] Federally Enforceable Through Title V Permit
4. While dormant, normal source testing shall not be required. [District Rule 2080] Federally Enforceable Through Title V Permit
5. Upon recommencing operation of this unit, normal source testing shall resume. [District Rule 2080] Federally Enforceable Through Title V Permit
6. Any source testing required by this permit shall be performed within 60 days of recommencing operation of this unit, regardless of whether the unit remains active or is again designated as dormant. [District Rule 2080] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

**YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (661) 392-5500 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT.** This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO

**COPY**

Arnaud Marjollet, Director of Permit Services  
S-1114-103-7 Aug 6 2014 1:31PM - DAVIDSOS Joint Inspection NOT Required

7. Records of all dates and times that this unit is designated as dormant or active, and copies of all corresponding notices to the District, shall be maintained, retained for a period of at least five years, and made available for District inspection upon request. [District Rule 1070]
8. Permittee shall maintain with the permit accurate fugitive component count associated with operation of engine/compressor and resultant emissions calculated using EPA Publication 453/R-95-017, Table 2-4 factors. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The engine shall only burn natural gas with fuel gas sulfur content of 2.0 grains/100 Scf or less. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Air contaminant emissions shall not exceed any of the following: NOx: 11ppmv @ 15% O<sub>2</sub>; VOC: 30 ppmv @ 15% O<sub>2</sub>; CO: 400 ppmv @ 15% O<sub>2</sub>; and PM<sub>10</sub>: 10.0 lb/MMscf. [District Rules 2201 and 4702] Federally Enforceable Through Title V Permit
11. The permittee shall monitor and record the stack concentrations of NOx (as NO<sub>2</sub>), CO, and O<sub>2</sub> at least once every calendar quarter using a portable emission monitor that meets District specifications [in stack O<sub>2</sub> monitors may be allowed if approved by the APCO]. Monitoring shall be performed not less than once every month for 12 months if 2 consecutive deviations are observed during quarterly monitoring. Monitoring shall not be required if the engine is not in operation, i.e. the engine need not be started solely to perform monitoring. Monitoring shall be performed within 1 day of restarting the engine unless monitoring has been performed within the last month if on a monthly monitoring schedule, or within the last quarter if on a quarterly monitoring schedule. Records must be maintained of the dates of non-operation to validate extended monitoring frequencies. [District Rules 2201 and 4702] Federally Enforceable Through Title V Permit
12. If the NOx and/or CO concentrations corrected to 15% O<sub>2</sub>, as measured by the portable analyzer, exceed the permitted emission concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 8 hours after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 8 hours, the permittee shall notify the District within the following 1 hour, conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing by this condition. [District Rules 2201 and 4702] Federally Enforceable Through Title V Permit
13. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O<sub>2</sub> measurements, (2) the O<sub>2</sub> concentration in percent and the measured NOx and CO concentrations corrected to 15% O<sub>2</sub>, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 2201 and 4702] Federally Enforceable Through Title V Permit
14. District witnessed or approved compliance source testing for NOx, VOC, and CO emission limits shall be demonstrated not less than once every 24 months. [District Rules 2201 and 4702] Federally Enforceable Through Title V Permit
15. Compliance demonstration (source testing) shall be by District witnessed, or authorized, sample collection by ARB certified testing laboratory. [District Rule 1081] Federally Enforceable Through Title V Permit
16. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
17. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
18. The following test methods shall be used: NOx (ppmv) - EPA Method 7E or ARB Method 100, CO (ppmv) - EPA Method 10 or ARB Method 100, stack gas oxygen - EPA Method 3 or 3A or ARB Method 100, and VOC (ppmv) - EPA Method 25A or 25B, or ARB Method 100. [District Rules 1081, 4701, and 4702] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE



19. Fuel sulfur content and higher heating value shall be measured quarterly using gas chromatographic analysis to calculate SOx emission rate. Test reports of measured fuel sulfur content and higher heating value shall be maintained. The calculated SOx emission rate shall be recorded in format approved by the District. If compliance with the SOx emission rate has been demonstrated for 8 consecutive quarters for a fuel source, then the testing frequency shall be annually. If an annual fuel sulfur content and higher heating value testing fails to show compliance, quarterly testing shall resume. [District Rule 1070] Federally Enforceable Through Title V Permit
20. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201, 3.1] Federally Enforceable Through Title V Permit
21. Sulfur compound emissions shall not exceed 0.2% by volume, 2000 ppmv, on a dry basis averaged over 15 consecutive minutes. [Kern County Rule 407] Federally Enforceable Through Title V Permit
22. The sulfur content of the natural gas being fired in the engine shall be determined using ASTM method D1072, D3031, D4084 or D3246. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
23. Permittee shall operate this engine with a nonresettable fuel meter and a nonresettable elapsed operating time meter. In lieu of operating a nonresettable fuel meter, the owner or operator may use an alternative device, method, or technique in determining monthly fuel consumption provided that the alternative is approved by the APCO. Permittee shall maintain these required meters in proper operating condition. The fuel meter shall be calibrated periodically per the recommendations of the manufacturer. [District Rules 2201, 4701, and 4702] Federally Enforceable Through Title V Permit
24. Emissions source testing shall be conducted with the engine operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. [District Rules 4701 and 4702] Federally Enforceable Through Title V Permit
25. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit, the test cannot be used to demonstrate compliance with an applicable limit. VOC emissions shall be reported as methane. VOC, NOx, and CO concentrations shall be reported in ppmv, corrected to 15% oxygen. [District Rules 4701 and 4702] Federally Enforceable Through Title V Permit
26. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4701 and 4702] Federally Enforceable Through Title V Permit
27. The permittee shall maintain an engine operating log to demonstrate compliance. The engine operating log shall include, on a monthly basis, the following information: total hours of operation, type and quantity (cubic feet of gas or gallons of liquid) of fuel used, maintenance or modifications performed, monitoring data, compliance source test results, and any other information necessary to demonstrate compliance. [District Rule 4702] Federally Enforceable Through Title V Permit
28. This engine shall be operated and maintained in proper operating condition per the manufacturer's requirements as specified on the Inspection and Monitoring (I&M) plan submitted to the District. [District Rule 4702 and 40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
29. The permittee shall update the I&M plan for this engine prior to any planned change in operation. The permittee must notify the District no later than seven days after changing the I&M plan and must submit an updated I&M plan to the APCO for approval no later than 14 days after the change. The date and time of the change to the I&M plan shall be recorded in the engine's operating log. For modifications, the revised I&M plan shall be submitted to and approved by the APCO prior to issuance of the Permit to Operate. The permittee may request a change to the I&M plan at any time. [District Rule 4702] Federally Enforceable Through Title V Permit
30. On and after October 19, 2013, the engine shall be in full compliance with the applicable sections of 40 CFR Part 63, Subpart ZZZZ (National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines). [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

31. On and after October 19, 2013, the permittee must minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the emissions standards applicable to all times other than startup in Table 2d of 40 CFR 63 Subpart ZZZZ apply. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
32. On and after October 19, 2013, the engine's oil and filter shall be changed every 1,440 hours of operation or every 12 months, whichever comes first. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
33. On and after October 19, 2013, the engine's spark plugs shall be inspected every 1,440 hours of operation or every 12 months, whichever comes first, and replaced as necessary. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
34. On and after October 19, 2013, the engine's hoses and belts shall be inspected every 1,440 hours of operation or every 12 months, whichever comes first, and replaced as necessary. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
35. On and after October 19, 2013, the permittee shall maintain records of engine hours, dates, and cumulative hours since last service for each of the following maintenance activities: oil and filter changes, spark plug inspection and replacement, hose and belt inspection and replacement. [40 CFR 63 Subpart ZZZZ]
36. On and after October 19, 2013, the permittee shall maintain records that include any information necessary to demonstrate compliance with 40 CFR 63, ZZZZ. [District Rule 1070 and 40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
37. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 4702 and 40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit

# ATTACHMENT C

Emissions Increases

	SSIPE (lb/yr)				
	NOx	VOC	CO	SOx	PM10
S-1114-103-6	-1160	0	0	0	0
S-1114-103-7	0	0	0	0	0
Total	-1160	0	0	0	0

# ATTACHMENT D

Application

# San Joaquin Valley Air Pollution Control District

www.valleyair.org

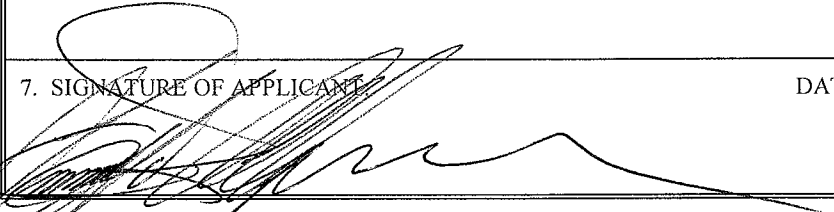
RECEIVED

JUN 25 2014

SJVAPCD  
Southern Region

## Permit Application For:

☒ ADMINISTRATIVE AMENDMENT    ☐ MINOR MODIFICATION    ☐ SIGNIFICANT MODIFICATION

1. PERMIT TO BE ISSUED TO: Seneca Resources	
2. MAILING ADDRESS:  STREET/P.O. BOX: <u>2131 Mars Court</u>  CITY: <u>Bakersfield</u> STATE: <u>CA</u> 9-DIGIT ZIP CODE: <u>93308</u>	
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED:  STREET: <u>13800 Holloway Road</u> CITY: <u>North Lost Hills field</u>  ¼ SECTION <u>NE 24</u> TOWNSHIP <u>26S</u> RANGE <u>20E</u>	INSTALLATION DATE: Completed as of 06.25.14
4. GENERAL NATURE OF BUSINESS: Oil-gas exploration and production	
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary)  325 BHP Caterpillar (Model G3406) gas compressor engine, Project S-1141701, ATC Permit S-1114-103-7	
6. TYPE OR PRINT NAME OF APPLICANT: Timothy R. Alburger	TITLE OF APPLICANT: EHS Manager
7. SIGNATURE OF APPLICANT:  DATE: 06.25.14	PHONE: (661) 399.4270, ext. 3544 FAX: (661) 399.7706 EMAIL: alburgert@srcx.com

### For APCD Use Only:

DATE STAMP	FILING FEE RECEIVED: \$ _____ CHECK#: _____
	DATE PAID: _____
	PROJECT NO: <u>S-1142944</u> FACILITY ID: <u>S-1114</u>

RECEIVED  
JUN 25 2014  
SJVAPCD  
Southern Region

**San Joaquin Valley  
Unified Air Pollution Control District**

**TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM**

**I. TYPE OF PERMIT ACTION (Check appropriate box)**

- ☐ SIGNIFICANT PERMIT MODIFICATION  
☐ MINOR PERMIT MODIFICATION
- ☒ ADMINISTRATIVE  
AMENDMENT

COMPANY NAME: <b>Seneca Resources</b>	FACILITY ID: <b>S- 1114</b>
1. Type of Organization: <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Sole Ownership <input type="checkbox"/> Government <input type="checkbox"/> Partnership <input type="checkbox"/> Utility	
2. Owner's Name:	
3. Agent to the Owner:	

**II. COMPLIANCE CERTIFICATION (Read each statement carefully and initial all circles for confirmation):**

- ☒ Based on information and belief formed after reasonable inquiry, the equipment identified in this application will continue to comply with the applicable federal requirement(s).
- ☒ Based on information and belief formed after reasonable inquiry, the equipment identified in this application will comply with applicable federal requirement(s) that will become effective during the permit term, on a timely basis.
- ☒ Corrected information will be provided to the District when I become aware that incorrect or incomplete information has been submitted.
- ☒ Based on information and belief formed after reasonable inquiry, information and statements in the submitted application package, including all accompanying reports, and required certifications are true accurate and complete.

I declare, under penalty of perjury under the laws of the state of California, that the forgoing is correct and true:

  
\_\_\_\_\_  
Signature of Responsible Official

June 25, 2014  
\_\_\_\_\_  
Date

**Brad Elliott**  
\_\_\_\_\_

Name of Responsible Official (please print)

**Vice President – West Division**  
\_\_\_\_\_

Title of Responsible Official (please print)

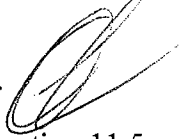


RECEIVED  
JUN 25 2014  
SJVAPCD  
Southern Region

DATE: June 25, 2014

TO: San Joaquin Valley Unified Air Pollution Control District

ATTENTION: Robert Rinaldi

FROM: Timothy R. Alburger 

SUBJECT: District Rule 2520, Section 11.5 – Administrative Amendment

The enclosed application is to amend administratively an Authority to Construct Permit, as noted in the table.

Permit S-1114-X-X	Comment
-103-7	325 BHP Caterpillar (Model G3406) engine, Project 1141701

With regard to the TVFORM-008 instructions, please issue Seneca Resources the requisite invoice for the attendant processing fee.

If there are any comments or questions regarding this matter, I may be reached at 661.399.4270, ext. 3544.

Enclosures

TVFORM-008

TVFORM-009



# ATTACHMENT E

Previous Title V Operating Permit  
S-1114-103-5

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-1114-103-5

**EXPIRATION DATE:** 02/29/2016

**SECTION:** NE24 **TOWNSHIP:** 26S **RANGE:** 20E

**EQUIPMENT DESCRIPTION:**

325 HP NATURAL GAS-FIRED CATERPILLAR MODEL G3406 IC ENGINE WITH THREE WAY CATALYST, DRIVING A GAS COMPRESSOR

## PERMIT UNIT REQUIREMENTS

---

1. Permittee shall maintain with the permit accurate fugitive component count associated with operation of engine/compressor and resultant emissions calculated using EPA Publication 453/R-95-017, Table 2-4 factors. [District Rule 2201] Federally Enforceable Through Title V Permit
2. The engine shall only burn natural gas with fuel gas sulfur content of 2.0 grains/100 Scf or less. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Air contaminant emissions shall not exceed any of the following: NOx: 25 ppmv @ 15% O<sub>2</sub>; VOC: 30 ppmv @ 15% O<sub>2</sub>; CO: 400 ppmv @ 15% O<sub>2</sub>; and PM<sub>10</sub>: 10.0 lb/MMscf. [District Rules 2201 and 4702, 5.1] Federally Enforceable Through Title V Permit
4. The permittee shall monitor and record the stack concentrations of NOx (as NO<sub>2</sub>), CO, and O<sub>2</sub> at least once every calendar quarter using a portable emission monitor that meets District specifications [in stack O<sub>2</sub> monitors may be allowed if approved by the APCO]. Monitoring shall be performed not less than once every month for 12 months if 2 consecutive deviations are observed during quarterly monitoring. Monitoring shall not be required if the engine is not in operation, i.e. the engine need not be started solely to perform monitoring. Monitoring shall be performed within 1 day of restarting the engine unless monitoring has been performed within the last month if on a monthly monitoring schedule, or within the last quarter if on a quarterly monitoring schedule. Records must be maintained of the dates of non-operation to validate extended monitoring frequencies. [District Rules 2201 and 4702] Federally Enforceable Through Title V Permit
5. If the NOx and/or CO concentrations corrected to 15% O<sub>2</sub>, as measured by the portable analyzer, exceed the permitted emission concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 8 hours after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 8 hours, the permittee shall notify the District within the following 1 hour, conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing by this condition. [District Rules 2201 and 4702] Federally Enforceable Through Title V Permit
6. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O<sub>2</sub> measurements, (2) the O<sub>2</sub> concentration in percent and the measured NOx and CO concentrations corrected to 15% O<sub>2</sub>, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 2201 and 4702] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

7. District witnessed or approved compliance source testing for NO<sub>x</sub>, VOC, and CO emission limits shall be demonstrated not less than once every 24 months. [District Rules 2201 and 4702] Federally Enforceable Through Title V Permit
8. Compliance demonstration (source testing) shall be by District witnessed, or authorized, sample collection by ARB certified testing laboratory. [District Rule 1081] Federally Enforceable Through Title V Permit
9. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
10. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
11. The following test methods shall be used: NO<sub>x</sub> (ppmv) - EPA Method 7E or ARB Method 100, CO (ppmv) - EPA Method 10 or ARB Method 100, stack gas oxygen - EPA Method 3 or 3A or ARB Method 100, and VOC (ppmv) - EPA Method 25A or 25B, or ARB Method 100. [District Rules 1081, 4701, and 4702] Federally Enforceable Through Title V Permit
12. Fuel sulfur content and higher heating value shall be measured quarterly using gas chromatographic analysis to calculate SO<sub>x</sub> emission rate. Test reports of measured fuel sulfur content and higher heating value shall be maintained. The calculated SO<sub>x</sub> emission rate shall be recorded in format approved by the District. If compliance with the SO<sub>x</sub> emission rate has been demonstrated for 8 consecutive quarters for a fuel source, then the testing frequency shall be annually. If an annual fuel sulfur content and higher heating value testing fails to show compliance, quarterly testing shall resume. [District Rule 1070] Federally Enforceable Through Title V Permit
13. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201, 3.1] Federally Enforceable Through Title V Permit
14. Sulfur compound emissions shall not exceed 0.2% by volume, 2000 ppmv, on a dry basis averaged over 15 consecutive minutes. [Kern County Rule 407] Federally Enforceable Through Title V Permit
15. The sulfur content of the natural gas being fired in the engine shall be determined using ASTM method D1072, D3031, D4084 or D3246. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
16. Permittee shall operate this engine with a nonresettable fuel meter and a nonresettable elapsed operating time meter. In lieu of operating a nonresettable fuel meter, the owner or operator may use an alternative device, method, or technique in determining monthly fuel consumption provided that the alternative is approved by the APCO. Permittee shall maintain these required meters in proper operating condition. The fuel meter shall be calibrated periodically per the recommendations of the manufacturer. [District Rules 2201, 4701, and 4702] Federally Enforceable Through Title V Permit
17. Emissions source testing shall be conducted with the engine operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. [District Rules 4701 and 4702] Federally Enforceable Through Title V Permit
18. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit, the test cannot be used to demonstrate compliance with an applicable limit. VOC emissions shall be reported as methane. VOC, NO<sub>x</sub>, and CO concentrations shall be reported in ppmv, corrected to 15% oxygen. [District Rules 4701 and 4702] Federally Enforceable Through Title V Permit
19. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4701 and 4702] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

20. The permittee shall maintain an engine operating log to demonstrate compliance. The engine operating log shall include, on a monthly basis, the following information: total hours of operation, type and quantity (cubic feet of gas or gallons of liquid) of fuel used, maintenance or modifications performed, monitoring data, compliance source test results, and any other information necessary to demonstrate compliance. [District Rule 4702] Federally Enforceable Through Title V Permit
21. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070 and 4702, 6.2.2; 40 CFR 63, ZZZZ] Federally Enforceable Through Title V Permit
22. On and after October 19, 2013, the engine shall be in full compliance with 40 CFR Part 63, Subpart ZZZZ (National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines). [40 CFR 63, ZZZZ]
23. On and after October 19, 2013, the permittee must minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes. [40 CFR 63, ZZZZ]
24. On and after October 19, 2013, the engine's oil and filter shall be changed every 4,320 hours of operation or every 12 months, whichever comes first. [40 CFR 63, ZZZZ]
25. On and after October 19, 2013, the engine's spark plugs shall be inspected every 4,320 hours of operation or every 12 months, whichever comes first, and replaced as necessary. [40 CFR 63, ZZZZ]
26. On and after October 19, 2013, the engine's hoses and belts shall be inspected every 4,320 hours of operation or every 12 months, whichever comes first, and replaced as necessary. [40 CFR 63, ZZZZ]
27. On and after October 19, 2013, the permittee shall maintain monthly records that include any information necessary to demonstrate compliance with 40 CFR 63, ZZZZ. [District Rule 1070 and 40 CFR 63, ZZZZ]
28. On and after October 19, 2013, the permittee shall maintain monthly records of all performance tests, opacity and visible emissions observations and required maintenance performed on the air pollution control and monitoring equipment. [District Rule 1070 and 40 CFR 63, ZZZZ]
29. On and after October 19, 2013, the permittee shall maintain monthly records of the occurrence and duration of each malfunction of the operation (i.e., process equipment) or the air pollution control and monitoring equipment. The permittee shall also maintain monthly records of the action(s) taken during periods of malfunction to minimize emissions in accordance with §63.6605(b), including corrective actions to restore malfunctioning operation and air pollution control and monitoring equipment to its normal or usual manner of operation. [District Rule 1070 and 40 CFR 63, ZZZZ]

These terms and conditions are part of the Facility-wide Permit to Operate.